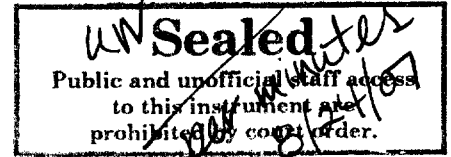


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION



UNITED STATES OF AMERICA

V.

THERESA WILLIAMS
DIANNE WINZER
ERIC AMOAKO
DEANDREA S. WADE

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CRIMINAL NO. H-07-

H 07 351

SEALED

INDICTMENT

UNITED STATES COURTS
SOUTHERN DISTRICT OF TEXAS
FILED

AUG 22 2007

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTION

MICHAEL N. MILBY, CLERK OF COURT

At all times material herein:

1. The Hartford Insurance Company(The Hartford) was based in Hartford, Connecticut and provided workers compensation coverage to employers and employees for employment related injuries.

2. Sandra Washington Johnson was employed by The Hartford Insurance Company in Houston, Texas as a Level III adjuster with authority to issue settlement checks in workers compensation claims. She also controlled a business called C. Johnson Claims Service.

3. **Theresa Williams** owned and/or controlled clinics called Chiropractic Injury & Rehab and Antioch Pain and Wellness Center, both located in Houston, Texas.

4. **Dianne Winzer** owned and/or controlled clinics called Brighter Days Outpatient Rehab and Amigos Accident & Work Injury Clinic, both located in Houston, Texas, and claimed to own a clinic called Total Rehab of Monroe, also called Winzer Total Rehab, located in Monroe, Louisiana.

6. **Eric Amoako** was the former owner of a clinic called Gulfway Medical located in Groves, Texas.

6. **Deandrea S. Wade** was an employee and bank account signor for Amigos Accident & Work Injury Clinic.

COUNT 1
(Conspiracy - 18 U.S.C. §371)

A. INTRODUCTION

1. The allegations in paragraphs 1-6 of the Introduction of this Indictment are hereby adopted, realleged, and incorporated as if set out fully herein.

B. THE CONSPIRACY AND ITS OBJECTS

2. Beginning on or about September 1, 2005, and continuing to at least June 7, 2006, in the Houston Division of the Southern District of Texas, and elsewhere,

**THERESA WILLIAMS,
DIANNE WINZER,
ERIC AMOAKO, and
DEANDREA S. WADE,**

defendants herein, did knowingly, combine, conspire, confederate and agree with each other and other persons known and unknown to the grand jury to knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and in execution of said scheme and artifice, placed and caused to be placed in any post office or authorized depository for mail matter, a matter or thing to be sent and delivered by the Postal Service or any private or commercial interstate carrier, in violation of Title 18, United States Code, Section 1341.

B. THE MANNER AND MEANS OF THE CONSPIRACY

It was a part of the conspiracy that:

3. Sandra Washington Johnson would and did authorize fraudulent workers compensation payments to be made from The Hartford to clinics owned or controlled by the defendants.

4. The defendants and Sandra Washington Johnson would and did cause The Hartford to mail fraudulent payments from The Hartford's main office in Hartford, Connecticut to the clinics owned or controlled by the co-conspirators.

5. The defendants would and did kick back money in the form of checks from the clinics to the Sandra Washington Johnson who had authorized the fraudulent workers compensation payments.

C. OVERT ACTS

6. In furtherance of the conspiracy, and to effect the objects thereof, the defendants performed and caused to be performed, among others, the overt acts set forth in Counts Two and the acts alleged in Counts Three through Fourteen of this Indictment, hereby re-alleged and incorporated as if fully set forth in this Count of the Indictment.

In violation of Title 18, United States Code, Section 371.

COUNT 2

(Conspiracy to Launder Funds - 18 U.S.C. §1956(h))

A. INTRODUCTION

1. The allegations in paragraphs 1-6 of the Introduction of this Indictment are hereby adopted, realleged, and incorporated as if set out fully herein.

B. THE CONSPIRACY AND ITS OBJECTS

2. Beginning on or about September 1, 2005, and continuing through at least June 7, 2006, in the Houston Division of the Southern District of Texas, and elsewhere,

**THERESA WILLIAMS,
DIANNE WINZER,
ERIC AMOAKO, and
DEANDREA S. WADE,**

defendants herein, together with other persons known and unknown to the grand jury, did unlawfully and knowingly combine, conspire, confederate, and agree with others, to conduct financial transactions which involved proceeds of a specified unlawful activity, that is: checks were written from the bank accounts of businesses to “Charlie Johnson” and “C. Johnson Claims Service”, using funds obtained as a result of a scheme to defraud The Hartford Insurance Company, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, that is, acts chargeable as mail fraud under Title 18, U.S.C. §1341, and knowing that the transactions were designed in whole or in part to promote the carrying on of such specified unlawful activity, and to conceal and disguise the nature, source, ownership and control of the proceeds of specified unlawful activity, all in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I) and (B)(I).

C. THE MANNER AND MEANS OF THE CONSPIRACY

3. Among the manner and means by which the defendant sought to accomplish and did accomplish the purpose of the scheme to defraud were the acts set forth in paragraphs 3 through 5 of Count One of this Indictment, hereby re-alleged and incorporated as if fully set forth in these counts.

D. OVERT ACTS

4. In furtherance of the conspiracy, and to effect the objects thereof, the defendant and the co-conspirators performed and caused to be performed, in the Southern District of Texas and elsewhere, among others, the following overt acts:

OVERT ACT	DATE	AMOUNT OF CHECK	PAYOR	PAYEE LISTED ON CHECK	DISPOSITION OF FUNDS
1	January 17, 2006	\$62,373.25	Chiropractic Injury and Rehab	Charlie Johnson	Converted to cashier's check
2	January 17, 2006	\$5,954.00	Brighter Days Outpatient Rehab	Charlie Johnson	Deposited to Charles Thomas Johnson, Jr., dba C. Johnson Claim Service account
3	January 23, 2006	\$20,473.00	Amigos Accident & Work Injury Clinic	C. Johnson Claims Service	Deposited to Charles Thomas Johnson, Jr., dba C. Johnson Claim Service account
4	January 26, 2006	\$52,080.46	Eric Amoako	C. Johnson Claims Service	Deposited to Charles Thomas Johnson, Jr., dba C. Johnson Claim Service account
5	February 13, 2006	\$34,265.49	Winzer Total Rehab	Charlie Johnson	cashed
6	February 15, 2006	\$11,658.66	Amigos Accident & Work Injury Clinic	Charlie Johnson	Deposited to Charles Thomas Johnson, Jr., dba C. Johnson Claim Service account
7	February 21, 2006	\$27,030.00	Chiropractic Injury and Rehab	C. Johnson Claims Service	cashed
8	February 23, 2006	\$3,250.00	Chiropractic Injury and Rehab	Charlie Johnson Claims	cashed

9	April 15, 2006	\$5,000.00	Winzer Total Rehab	Charlie Johnson	cashed
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In violation of Title 18, United States Code, Section 1956(h).

COUNTS 3- 20

(Mail Fraud - 18 U.S.C. §§1341 and 2)

A. INTRODUCTION

1. The allegations in paragraphs 1-6 of the Introduction of this Indictment are hereby adopted, realleged, and incorporated as if set out fully herein.

B. SCHEME TO DEFRAUD

2. Beginning on or about September 1, 2005, and continuing through at least June 7, 2006, in the Houston Division of the Southern District of Texas, and elsewhere,

**THERESA WILLIAMS,
DIANNE WINZER,
ERIC AMOAKO, and
DEANDREA S. WADE,**

defendants herein, aided and abetted by others known and unknown to the grand jury, did knowingly devise and intend to devise a scheme and artifice to defraud The Hartford Insurance Company, and to obtain money and property by false and fraudulent pretenses, representations and promises, all as more fully set forth below.

C. THE MANNER AND MEANS OF THE SCHEME TO DEFRAUD

3. Among the manner and means by which the defendant sought to accomplish and did accomplish the purpose of the scheme to defraud were the acts set forth in paragraphs 3 through 5 of Count One of this Indictment, hereby re-alleged and incorporated as if fully set forth in these counts.

D. EXECUTION OF THE SCHEME TO DEFRAUD

4. On or about the dates set forth below, in the Houston Division of the Southern District of Texas, and elsewhere, for the purpose of executing the scheme and artifice to defraud The Hartford Insurance Company, and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and intending to do so, the defendant knowingly sent or caused to be delivered through the United States Mail or by any private or commercial interstate carrier, according to the directions thereon, to Houston, Texas, metropolitan area, in the Southern District of Texas, and Monroe, Louisiana in the Northern District of Louisiana, the following checks:

COUNT	DATE	PAYEE	AMOUNT
3	January 6, 2006	Chiropractic and Injury Rehab	\$26,735.00
4	January 9, 2006	Brighter Days Outpatient Rehab	\$22,025.49
5	January 12, 2006	Gulfway Medical Rehab	\$40,639.88
6	January 16, 2006	Amigos Accident and Work Injury	\$40,947.25
7	January 17, 2006	Gulfway Medical Rehab	\$63,521.00
8	January 18, 2006	Chiropractic and Injury Rehab	\$53,281.50
9	January 19, 2006	Total Rehab of Monroe	\$31,772.70
10	February 1, 2006	Brighter Days Outpatient Rehab	\$45,196.00
11	February 7, 2006	Amigos Accident and Work Injury	\$27,319.00
12	February 11, 2006	Chiropractic and Injury Rehab	\$54,060.00

13	February 27, 2006	Chiropractic and Injury Rehab	\$32,196.00
14	March 15, 2006	Amigos Accident and Work Injury	\$18,286.00
15	March 20, 2006	Antioch Pain and Wellness Center	\$23,604.00
16	April 3, 2006	Total Rehab of Monroe	\$52,405.00
17	April 3, 2006	Total Rehab of Monroe	\$40,750.00
18	April 10, 2006	Chiropractic and Injury Rehab	\$25,600.00
19	April 14, 2006	Gulfway Medical Rehab	\$47,175.00
20	May 2, 2006	Chiropractic and Injury Rehab	\$43,000.00
21	May 19, 2006	Antioch Pain and Wellness Center	\$40,000.00

In violation of Title 18, United States Code, Sections 1341 and 2.

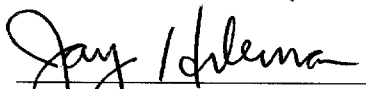
TRUE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

DONALD J. DeGABRIELLE, JR.
United States Attorney

By:


Jay Hileman
Assistant United States Attorney
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